

May 1, 2015

Commonwealth of VA DEQ
4949A Cox Road
Glen Allen, VA 23060

RE: Virginia Pollutant Discharge Elimination System (VPDES) Permit No. VAR040119
Municipal Separate Storm Sewer System (MS4) Annual Report 2013-2014

Dear Mr. Oremland,

Thank you for your review of the Virginia State University 2013-2014 Annual Report. Timmons Group has prepared a response letter with supplemental information addressing your comments. This supplemental information will also be included in the 2014-2015 Annual Report and Updated Program Plan. Each of your comments is included below, followed by a response in red.

Minimum Control Measure 1 - Public Education and Outreach on Stormwater Impacts
Permit II.B.1.g(2)

Provide the estimated number of people that will be reached, and an estimated percentage of the target audience or audiences that will be reached for each identified high-priority water quality issue. The Program Plan should also be updated to include these numbers.

Response: VSU has revised the process of reaching the students and faculty target audience since the Annual Report was submitted. Below is the table from the MS4 Program Plan (pg6) which has been updated to reflect percentages of target audiences and also VSU's updated processes. The changes are indicated in red below and will be reflected in the updated Program Plan that will be submitted with the 2014-2015 Annual Report.

High-Priority Water Quality Issue	Rationale	Target Audience	Population Size
Poor Quality Receiving Waters	Minimize the impact of University Development on the hydrologic cycle in an effort to improve poor quality receiving waters downstream of campus	Professional Architectural and Engineering (A/E) Community performing planning and designs on campus	Approximately 7 firms were actively planning and designing developments on campus at the time this plan was prepared. All 7 firms will be emailed links to this information to achieve distribution to 100% of the target audience.
Student and Faculty	Overcome the challenge of	Students, Faculty, and	Approximately 5,063

Stormwater Education and Outreach	communicating with students who may not regularly seek out environmental information in an effort to provide general stormwater education	Staff with active email accounts	students and 1,255 faculty/staff had active email accounts at the time this plan was prepared. All 6,318 will be emailed the stormwater educational materials to achieve distribution to 100% of the target audience.
Dumpster and Litter Management on campus	Minimize the impact of trash and litter handled by Facilities Management Staff on receiving waters downstream of campus.	Students, Faculty, and Staff with active email accounts	Approximately 5,063 students and 1,255 faculty/staff had active email accounts at the time this plan was prepared. All 6,318 will be emailed the stormwater educational materials to achieve distribution to 100% of the target audience.

Minimum Control Measure 2 - Public Involvement/Participation

Permit II.B.2.d(1)

Provide the web link to the MS4 program plan and annual report. The link provided in the Annual Report does not work. One link for a web page containing both documents is sufficient.

Response: The web link provided in the Annual Report was the correct link at the time of submittal. However, the web link has since been revised. Both the Annual Report and the MS4 Program Plan can be found here: <http://vsu.edu/about/administrative-offices/admin-finance/capital-outlay-and-facilities/programs-resources-procedures.php>.

Minimum Control Measure 3 - Illicit Discharge Detection and Elimination

Permit II.B.3.f(2)

Confirm the 22 outfalls screened represent all facility outfalls.

Response: The 22 outfall locations Identified in the program plan represent all known VSU MS4 outfalls.

Minimum Control Measure 4 - Construction Site Stormwater Runoff Control

Permit II.B.4.f(1)

Clarify the discrepancy between Appendix MCM 4 of the Annual Report and Appendix I of the updated Program Plan with regards to land disturbing activities.

Response: Appendix MCM 4 of the Annual Report provides a summary of land disturbing activities that took place over the MS4 reporting period 07/2013 through 06/2014. "Appendix I" within the Program Plan is part of the VSU Annual Standards and Specifications for Erosion and Sediment Control and Stormwater Management, which require a list of current and anticipated land disturbing activities during the "Annual Standards" coverage period which runs 07/2014 through 12/2014.

Permit II.B.4.f(2)

Clarify the discrepancy between the total number of acres disturbed reported in the Annual Report text and the total acres disturbed in Appendix MCM 4.

Response: Approximately 50 acres of land was actually disturbed during the reporting period. The additional 276.7 acres listed in Appendix MCM4 refers to the permitted estimated disturbed area acreage listed on that particular VSMP General Permit Registration Statement, which covers multiple phases of campus wide improvements that are in the process of being constructed over several years. The campus wide project kicked off in June of 2014 but land disturbance did not actually begin until July 2014, after the reporting period.

Thank you for your review. Please feel free to contact me with any questions at 804-200-6544.

Respectfully submitted,

A handwritten signature in black ink that reads "Amelia Wehunt". The signature is written in a cursive, flowing style.

Amelia Wehunt, PE
Project Manager
Timmons Group